

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MISCELLANEOUS WAREHOUSEMEN'S)	
LOCAL 781 HEALTH & WELFARE FUND,)	
)	CIVIL ACTION
Plaintiff,)	
)	NO. 15 C 11
vs.)	
)	JUDGE EDMOND E. CHANG
FAMOUS LUBRICANTS, INC., an Illinois corp.,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, FAMOUS LUBRICANTS, INC., an Illinois corp., in the total amount of \$20,865.32, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$3,344.25.

On January 8, 2015, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on January 29, 2015. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for Plaintiffs
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have sent the above-referenced document by facsimile to the following non-CM/ECF participant on or before the hour of 4:00 p.m. this 25th day of March 2015:

Mr. James R. Goodale, Registered Agent/Secretary
Famous Lubricants, Inc.
124-132 W. 47th Street
Chicago, IL 60609
773-268-5815

/s/ Patrick N. Ryan _____

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